

REMARKS

Claims 13-16 are presented for consideration, with Claims 13 and 16 being independent.

Claims 13 and 16 have been amended to better set forth Applicant's invention and further distinguish it from the cited art. Support for the claim amendments can be found, for example, in Figures 3(a) through Figures 4(b), and the accompanying specification on page 19, line 22, *et. seq.*

The amendments to the claims were not presented earlier as it was believed that the previously presented claims would be found allowable. This Amendment does not add any additional claims. Moreover, the Examiner's familiarity with the subject matter of the present application will allow an appreciation of the significance of the amendments herein without undue expenditure of time and effort. Finally, the Amendment does not raise new issues requiring further consideration or search. Accordingly, it is submitted that entry of the Amendment is appropriate.

Claims 13-16 are rejected under 35 U.S.C. §112, first paragraph, for allegedly failing to comply with 1) the written description requirement, and 2) the enablement requirement. Without conceding to the propriety of these rejections, Claims 13 and 16 have been amended to better set forth Applicant's invention. As shown above, in amending the claims, the first, second, third, and fourth "distributions" of changed particles have been deleted. Accordingly, it is submitted that all the claims are in full compliance with the requirements of 35 U.S.C. §112, and therefore reconsideration and withdrawal of the rejections are respectfully requested.

Claims 13-16 also stand rejected under 35 U.S.C. §103 as allegedly being obvious over Johnson '267 in view of Kuwahara '866. This rejection is respectfully traversed.

Claim 13 of Applicant's invention relates to a display apparatus comprised of a first substrate provided with a closed container, first and second charged particles which are held in the closed container and having mutually different charge polarities and a substantially identical color, and first, second and third electrodes for generating an electric field in the closed container, with the first electrode being disposed on the first substrate.

As claimed, the display apparatus alternately executes a first display operation and a second display operation. In the first display operation, the first charged particles are collected on a first electrode side by changing a voltage applied to the second electrode or the third electrode after a first reset operation in which the first and second charged particles are collected on a second electrode side and on a third electrode side by applying a first voltage between the second electrode and to the third electrode. In the second display operation, second charged particles are collected on the first electrode side by changing a voltage applied to the second electrode or the third electrode after a second reset operation in which the first and second charged particles are collected on the second electrode side and on the third electrode side by applying a second voltage, opposite in polarity to the first voltage applied in the first reset operation, between the second electrode and the third electrode and by applying a voltage, opposite in polarity to that applied in the first reset operation, to the second electrode and to the third electrode.

The Johnson publication is directed to an electrophoretic display device that includes a matrix of pixels 10 provided between selection (row) electrodes 7 and data (column) electrodes 6, 6' (see Figure 1). Each pixel is filled with an electrophoretic medium and positively charged black particles 14 and negatively charged black particles 14'. Voltages are applied to the electrodes to provide a white display (Figure 2A), a black display (Figure 2B), and a gray display (Figure 2C) (see paragraphs [0028] and [0029]). As discussed in paragraph [0030], prepulses 40 are supplied to one of the first and second electrodes 6, 6'. The magnitude and duration of the prepulses are associated with an energy sufficient for releasing the charged particles 14, 14'.

In contrast to Applicant's invention, however, Johnson does not teach or suggest, among other features, first and second display operations that include first and second reset operations as set forth in Claim 13. In the claimed invention, in the first reset operation the first and second charged particles are collected on the second electrode side and on the third electrode side by applying a first voltage between the second electrode and to the third electrode, and in the second reset operation the first and second charged particles are collected on the second electrode side and on the third electrode side by applying a second voltage, opposite in polarity to the first voltage applied in the first reset operation, between the second electrode and the third electrode and by applying a voltage, opposite in polarity to that applied in the first reset operation, to the second electrode and to the third electrode. One advantage of performing the display operations in this manner is that accumulation of residual DC voltage can be prevented and stable display rewriting can be effected without the adverse effects of display burn-in.

In Applicant's claimed invention, therefore, the first and second reset operations collect the charged particles on the second electrode side and on the third electrode side. In Johnson, on the other hand, the prepulse application is efficient for releasing the charged particles 14, 14' in a first area near the first electrode 6 but too low to move them to an area near the third electrode 7 (see paragraph [0030], lines 11-16), and thus the charged particles are not collected in the manner set forth in Claim 13.

The secondary citation to Kuwahara relates to a display device and is relied on for teaching barrier walls and microcapsules. Kuwahara fails, however, to compensate for the deficiencies in Johnson with respect to Claim 13 as discussed above.

Accordingly, the proposed combination of Johnson and Kuwahara, even if proper, still fails to teach or suggest Claim 13 of Applicant's invention. Claim 16 relates to a driving method for driving a display apparatus and corresponds to Claim 13.

Therefore, reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. §103 is respectfully requested.

Thus, it is submitted that Applicant's invention as set forth in independent Claims 13 and 16 is patentable over the cited art. In addition, dependent Claims 14 and 15 set forth additional features of Applicant's invention. Independent consideration of the dependent claims is respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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